

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO. LTD,)
SAMSUNG ELECTRONICS AMERICA, INC.,)
SAMSUNG TELECOMMUNICATIONS)
AMERICA GENERAL, LLC,)
SAMSUNG SEMICONDUCTOR, INC., and)
SAMSUNG AUSTIN SEMICONDUCTOR LLC,)

Plaintiffs,)

v.)

ON SEMICONDUCTOR CORP. and)
SEMICONDUCTOR COMPONENTS)
INDUSTRIES, LLC,)

Defendants.)

C.A. No. 06-720 (***)

REDACTED
PUBLIC VERSION

DECLARATION OF PETER GREEN
IN SUPPORT OF MOTION TO DISMISS

Original Filing Date: January 22, 2007
Redacted Filing Date: January 29, 2007

PUBLIC VERSION - REDACTED

I, Peter Green, declare:

1. I was the Senior Vice President and General Manager of ON Semiconductor Corp. and Semiconductor Components Industries, LLC, (collectively "ON Semiconductor") from April 2004 through November 2006, after which I left ON Semiconductor. The following declaration is based on my personal knowledge. If called upon to testify, I could testify competently as to the matters set forth herein.

2. I participated in the August 16, 2006 negotiation meeting in Trenton, New Jersey between ON Semiconductor and Samsung Electronics Co. Ltd. ("Samsung"), regarding potential licensing of U.S. Patent Nos. 5,563,594 ("the '594 Patent"); 6,362,644 ("the '644 Patent"); and 5,361,001 ("the '001 Patent").

3. I have read the Declaration of Bradley J. Botsch, filed in this case on December 27, 2006. The description of the August 16, 2006 meeting in this declaration (Botsch Dec. ¶¶ 11-12) is consistent with my memory of the meeting.

4. In particular, I did not threaten Samsung with litigation regarding the '594, '644, and '001 Patents, nor did I hear Mr. Botsch, the only other ON Semiconductor representative present, making any such statements. Rather, ON Semiconductor made it clear that we hoped to reach a negotiated resolution to this dispute. Far from threatening suit after Samsung indicated our opening offer was unacceptable to them, at the end of the meeting Mr. Botsch requested that Samsung follow-up on the meeting by making a "formal response" to our offer. Mr. Muir agreed that Samsung would do this.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

PUBLIC VERSION - REDACTED

By: _____


Peter Green

SVI-42953v1

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on January 29, 2007, I electronically filed the foregoing with the Clerk of the Court using CM/ECF, which will send notification of such filing(s) to the following:

Josy W. Ingersoll
John W. Shaw

I also certify that copies were caused to be served on January 29, 2007 upon the following in the manner indicated:

BY HAND

Josy W. Ingersoll
John W. Shaw
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